

THE HONORABLE ROBERT S. LASNIK  
THE HONORABLE MICHELLE L. PETERSON

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VICKY CORNELL, individually, and in  
her capacity as the Personal Representative  
of the Estate of Christopher John Cornell  
a/k/a Chris Cornell,

Plaintiffs,

v.

SOUNDGARDEN, a purported Washing-  
ton General Partnership, KIM A. THAYIL,  
MATT D. CAMERON, HUNTER BENE-  
DICT SHEPHERD, RIT VENERUS and  
CAL FINANCIAL GROUP, INC.,

Defendants.

AND RELATED COUNTERCLAIMS

No. 2:20-cv-01218-RSL-MLP

**STIPULATED MOTION TO MODIFY  
SCHEDULING ORDER**

**NOTED ON MOTION CALENDAR:  
JULY 16, 2021**

Plaintiffs Vicky Cornell, individually and in her capacity as personal representative of the Estate of Christopher John Cornell, and Defendants Soundgarden, Kim A. Thayil, Matt D. Cameron, Hunter Benedict Shepherd, Soundgarden Recordings, LLC, Stage Mutha Fakir, Inc., SG Productions, Inc., and Loud Love Music (collectively, the “Parties”), hereby stipulate to modify the Court’s April 26 scheduling order (Dkt. No. 173 at 8) as follows:

Event	Existing Deadline	Proposed New Deadline
Reports of expert witnesses under FRCP 26(a)(2) due	July 22, 2021	August 5, 2021
Rebuttal expert disclosures under FRCP 26(a)(2) due	August 20, 2021	August 27, 2021
Expert discovery completed by	August 20, 2021	September 10, 2021
Fact discovery completed by	August 20, 2021	September 17, 2021
All motions to exclude testimony for failure to satisfy <i>Daubert</i> must be filed pursuant to LCR 7(d)	September 20, 2021	September 20, 2021* (no change)
Buyout Valuation Hearing pursuant to RCW 25.05.250	October 20, 2021	October 20, 2021* (no change)
All dispositive motions must be filed pursuant to LCR 7(d)	November 22, 2021	November 22, 2021* (no change)

The Parties agree that “good cause” exists to modify the Court’s scheduling order under Federal Rule of Civil Procedure 16(b)(4). *See also* LCR 16(b)(6); *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992). Good cause exists to modestly extend certain fact and expert discovery deadlines in the scheduling order given ongoing discussions between the Parties concerning potential resolution of this dispute. To be clear, the proposed extensions do not affect the motion deadline (still September 20) or the scheduled date of the Buyout Valuation Hearing (still October 20, 2021), and therefore affect only the Parties.

The Parties therefore respectfully request that the Court modify the April 26 scheduling order as set forth above.

1 **IT IS SO ORDERED:**

2 DATED this 19th day of July, 2021

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4 MICHELLE L. PETERSON  
5 United States Magistrate Judge  
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1 Presented by:

2 By: s/ William C. Rava

3 By: s/ Alison R. Caditz

4 William C. Rava #29948

5 Alison R. Caditz #51530

6 **Perkins Coie LLP**

7 1201 Third Avenue, Suite 4900

8 Seattle, WA 98101-3099

9 Telephone: 206.359.8000

10 Email: WRava@perkinscoie.com

11 Email: ACaditz@perkinscoie.com

12 Martin D. Singer (*pro hac vice*)

13 David Binder Jonelis (*pro hac vice*)

14 **Lavelly & Singer**

15 2049 Century Park East, Suite 2400

16 Los Angeles, CA 90067

17 Telephone: 310.556.3501

18 Email: djonelis@lavellysinger.com

19 Email: mdsinger@lavellysinger.com

20 James George Sammataro (*pro hac vice*)

21 Brendan S. Everman (*pro hac vice*)

22 **Pryor Cashman LLP**

23 201 South Biscayne Blvd., Suite 2700

24 Miami, FL 33131

25 Telephone: 786.582.3010

26 Email: jsammataro@pryorcashman.com

Email: beverman@pryorcashman.com

*Attorneys for Plaintiffs*

By: s/ Eric A. Lindberg

Paul H. Beattie

**Gravis Law**

7920 SE Stellar Way

Snoqualmie, WA 98065

Telephone: 206.696.9095

Email: pbeattie@gravislaw.com

Gabriel G. Gregg

Matthew H. Poppe

**Rimon PC**

800 Oak Grove Ave, Suite 250

Menlo Park, CA 94025

Telephone: 408.669.5354

Email: gabriel.gregg@rimonlaw.com

Email: Matthew.Poppe@rimonlaw.com

Michael A. Moore, WSBA No. 27047

Eric A. Lindberg, WSBA No. 43596

Nathan Y. Bishop, WSBA No. 57274

**Corr Cronin LLP**

1001 Fourth Avenue, Suite 3900

Seattle, WA 98154

Telephone: 206.625.8600

Email: mmoore@corrchronin.com

Email: elindberg@corrchronin.com

Email: nbishop@corrchronin.com

*Attorneys for Defendants*

By: s/ Eliot M. Harris

Eliot M. Harris

Jessica M. Cox

**Williams Kastner & Gibbs PLLC**

601 Union Street, Suite 4100

Seattle, WA 98101

Telephone: 206.628.6600

Email: eharris@williamskastner.com

Email: jcox@williamskastner.com

*Attorneys for Financial Defendants*